



**Lowenstein
Sandler**

Scott B. McBride
Partner

One Lowenstein Drive
Roseland, New Jersey 07068

T: 973.597.6136
F: 973.597.2400
E: smcbride@lowenstein.com

January 7, 2025

January 8, 2025

Via CM/ECF

Hon. Lewis J. Liman, U.S.D.J.
United States District Court
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007-1312

SO ORDERED.

A handwritten signature of Lewis J. Liman in black ink.

LEWIS J. LIMAN
United States District Judge

Re: Freeman v. Giuliani, No. 24-MC-353-LJL (S.D.N.Y.)
Request for Permission to File Pretrial Submission

Dear Judge Liman:

Counsel for Intervenor-Defendant respectfully requests permission to file his proposed findings of fact and conclusions of law per the Court's Individual Practices in Civil Cases. Owing to technical challenges, the submission was not made prior to 5pm this afternoon, and Your Honor's Order (ECF No. 184) appears to preclude its submission now without leave. Counsel has conferred with Plaintiffs' counsel, who do not object to the request.

Thank you for your consideration.

Respectfully submitted,

/s/ Scott B. McBride
Scott B. McBride